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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Eugene Glick, M.D., and Planned
Parenthood of Washoe County, a non-
profit Nevada Corporation,

Plaintiff,

vs.

Aaron Ford, in his capacity as Nevada
Attorney General, et al.,

Defendants

Case No.: 3:85-cv-00331-ART-CSD

**MOTION FOR SUBSTITUTION
AND TO BE DESIGNATED
SUCCESSOR PLAINTIFF,
PURSUANT TO FRCP 25(c)**

In light of the motion (Dkt. #83) of Defendants Jason D. Woodbury, Carson City District Attorney, and Stephen B. Rye, Lyon County District Attorney, for relief from the Court's Judgment (Dkt #74) and the Clerk's Judgment in a Civil Case (Dkt #75), Planned Parenthood Mar Monte, Inc., makes motion to substitute and be designated successor Plaintiff in the present matter. This motion is based upon the memorandum of points & authorities below, all papers and exhibits on file herein, and any argument this Court sees fit to allow at hearing.

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1 **MEMORANDUM OF POINTS & AUTHORITIES**

2 As detailed in the motion for relief filed by Defendants Woodbury and Rye,
3 Plaintiff Eugene Glick is deceased, and Plaintiff Planned Parenthood of Washoe
4 County (“PPWC”) is defunct. Pursuant to FRCP 25(c), movant Planned Parenthood
5 Mar Monte, Inc. (“PPMM”) seeks substitution and designation as Plaintiff in this
6 matter, and agrees with Woodbury and Rye that PPMM’s presence in the litigation
7 is both proper and will facilitate the conduct of this important litigation. PPMM
8 currently provides reproductive health care services across the region once served by
9 PPWC, and there is a clear continuity of interest in this multi-decade litigation, as
10 discussed by Defendants in Dkt. 83, 3-4. PPMM is a venerable organization serving
11 the community with health care services affected by the injunction at issue in this
12 matter, and will prosecute this matter with full recognition of its duties to assume
13 the positions and litigation goals of the original Plaintiffs.

14 PPMM makes this motion to afford the numerous Defendants opportunity to
15 be heard on the matter of its substitution and designation.

16 Furthermore, PPMM, as a new party to this litigation after almost forty years,
17 and anticipating the eventual grant of the present motion, asks the Court to set a
18 reasonable briefing schedule reflecting the age and duration of the case and the need
19 for appropriate preparation to prosecute the action from this juncture. PPMM,
20 therefore, requests **60 days** from the date of the order resolving this motion, after
21 any responses and replies are submitted and the Court has occasion to consider the
22 instant request, for the filing of a response to Dkt. 83. Thereafter, PPMM seeks the
23 pleasure of the Court in setting further deadlines for submissions by parties.

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1 PPMM asks the Court to grant the motion, to direct the clerk of the court to
2 make the appropriate amendments to the caption to reflect its entry into the action,
3 and to establish a briefing schedule as requested herein.

4 Dated this 31st day of January, 2024.

5 **BRAVO SCHRAGER LLP**

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7 By /s/ Bradley S. Schrager

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15 *Attorneys for Movant*
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CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of January, 2024, a true and correct copy of this **MOTION FOR SUBSTITUTION AND TO BE DESIGNATED SUCCESSOR PLAINTIFF, PURSUANT TO FRCP 25(c)** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

By /s/ Dannielle Fresaquez
Dannielle Fresquez, an Employee of
BRAVO SCHRAGER LLP